



Cigar Rights of America addresses the intent of the following regulatory measures that were proposed in the April 25, 2014 Deeming Regulation:

- CRA supports efforts to prevent adulteration and misbranding of tobacco products;
- CRA supports efforts to eliminate the use of terminology such as “light,” “low,” and “mild,” as descriptors and other “unproven modified risk claims”;
- Does not oppose efforts to issue standards regarding additives, constituents or other components, whereas premium handmade cigars have none;
- Cigar Rights of America submits that issues such as new warning labels for premium handmade cigars demands further review and analysis by the FDA CTP Tobacco Products Scientific Advisory Committee and additional panels and consultation to properly determine their applicability to premium handmade cigars, versus other products subject to existing regulation or under consideration for regulation;
- CRA supports all measures as outlined in the proposed Deeming document to have a proposed minimum age of 18 for the purchase of any tobacco product;
- CRA supports efforts to prohibit the sale and availability of tobacco products via vending machines.



Option 3: Targeted enforcement discretion for premiums

Adulteration/ Misbranding	Ingredient Listing	Prohibition on Vending Machine Sales
Registration and Product Listing	Elimination of Modified Risk Descriptors and Claims	Minimum Age of Purchase
Sample Ban	Revised Health Warnings	PMTA/SE